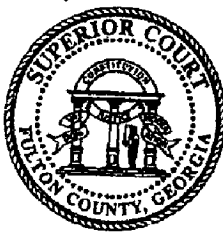


Exhibit “A”



IN THE SUPERIOR COURT OF FULTON COUNTY, GEORGIA

136 PRYOR STREET, ROOM C-103, ATLANTA, GEORGIA 30303

SUMMONS

Patricia Yearby
613 Summer Drive Sandy Springs
GA, 30328
 Plaintiff,

vs.

Golden Living Center of
North Side / St 70
Meridian Park ATL, GA 30342
 Defendant

Case No.: 2010 CV191908

TO THE ABOVE NAMED DEFENDANT(S):

You are hereby summoned and required to file with the Clerk of said Court and serve upon plaintiff's attorney, whose name and address is:

Patricia Yearby
613 Summer Drive
Sandy Springs GA, 30328

(770) 993-6334

An answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. **IF YOU FAIL TO DO SO, JUDGMENT BY DEFAULT WILL BE TAKEN AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.**

This 7TH day of OCTOBER, 2010

Honorable Cathelene "Tina" Robinson
 Clerk of Superior Court

By


 Deputy Clerk

To defendant upon whom this petition is served:

This copy of complaint and summons was served upon you _____, 20____

 Deputy Sheriff

General Civil Case Filing Information Form (Non-Domestic)

Court
☒ Superior
☐ State

County Fulton

Date Filed 10-06-10
MM-DD-YYYY

Docket # 2010CV191908

Plaintiff(s)

Yearby Patricia
Last First Middle I. Suffix Prefix Maiden

Last First Middle I. Suffix Prefix Maiden

Last First Middle I. Suffix Prefix Maiden

Last First Middle I. Suffix Prefix Maiden

No. of Plaintiffs 1

Plaintiff/Petitioner's Attorney ☒ Pro Se

Last First Middle I. Suffix

Bar # _____

Check Primary Type (Check only ONE)

- ☐ Contract/Account
- ☐ Wills/Estate
- ☐ Real Property
- ☐ Dispossessory/Distress
- ☐ Personal Property
- ☐ Equity
- ☐ Habeas Corpus
- ☐ Appeals, Reviews
- ☐ Post Judgment Garnishment, Attachment, or Other Relief
- ☐ Non-Domestic Contempt
- ☒ Tort (If tort, fill in right column)
- ☐ Other General Civil Specify _____

Defendant(s)

Golden Living Center of North
Last First Middle I. Suffix Prefix Maiden

Last First Middle I. Suffix Prefix Maiden

Last First Middle I. Suffix Prefix Maiden

Last First Middle I. Suffix Prefix Maiden

No. of Defendants 1

If Tort is Case Type:
(Check no more than TWO)

- ☐ Auto Accident
- ☐ Premises Liability
- ☐ Medical Malpractice
- ☒ Other Professional Negligence
- ☐ Product Liability
- ☐ Other Specify _____

Are Punitive Damages Pleaded? ☐ Yes ☐ No

IN THE SUPERIOR COURT OF FULTON COUNTY STATE OF GEORGIA

Patricia Yearby

Plaintiff,

v

Golden Living Center of Northside

Defendants,

*
*
*
*
*
*
*
*
*

CIVIL ACTION

FILE NO.: 2010 CV 191908**COMPLIANT FORDISABILITY DEMAND FOR JURY TRIAL**

PAY

COMES NOW Patricia Yearby in the above-styled tort action to recover damages for personal injuries from Defendants, and hereby shows the Court the following:

PARTIES, JURISDICTION, VENUE AND SERVICES OF PROCESS IS PROPER.

1.

Patricia Yearby is a citizen and resident of Georgia and by bringing this action subjects herself to the jurisdiction and hereby shows the Court the following:

2.

Defendants Golden Living Center of Northside is a principal place of business at 5470 Meridian Mark, Atlanta, GA 30342. Jurisdiction is proper over Defendant in this court because it is qualified to do business in Georgia, transacts business in Georgia, and maintains a registered agent in Fulton County, Georgia. Defendants may be served with process by this Court's issuing an original of the summons and Compliant, forwarding the same to the Sheriff of Fulton County, and the Sheriff therefore delivering summons and a copy of this Compliant upon

3.

1

Defendants are a subject to the jurisdiction and venue of this court.

FACTS

4.

On about October 8, 2008 Patricia Yearby was discharged from Saint Joseph Hospital to Golden Living Center of Northside. I was discharge to an extended care facility for rehab. I was discharged with a right knee immobilizer (a severe dislocated knee) and I continue to improve. I was to be strict non - weight bearing of the right lower extremity with knee immobilizer on at all times. The situation was discussed with me on how I should never take my knee immobilizer off for any reason.

5.

Patricia Yearby is suffering and continues to suffer painful injuries to her body and mind including debilitating personal injuries that caused and continue to cause physical and mental pain and suffering, medical bills and expenses.
with a deformed right
knee caused by negligence of the bath nurse.

6.

Defendants are liable for re-injuries and damages for October 9, 2008 the pain and suffering I went through caused by the bath nurse. Re-injuring my knee and my knee was swollen so huge and I was so weak I was slumped over.

7.

Defendants is liable for my right knee being deformed caused by negligence of the bath nurse Defendants.

8.
2

Defendants is responsible for not having proper elevator for handicapped wheelchair accessible doesn't meet the building codes of ADA Laws and regulations.

9.

Defendants is liable for my right knee being deformed caused by not having wheelchair handicapped accessible bathrooms. Defendants doesn't have proper wheelchair accessible bathrooms that didn't meet the Americans with Disabilities Act and Georgia Accessibility Standards.

10.

Defendants responsible for not having proper bathrooms made conditions dangerous for my leg etc...

11.

Defendants is liable because I asked for handicapped accessible room with handicapped bathroom.

12.

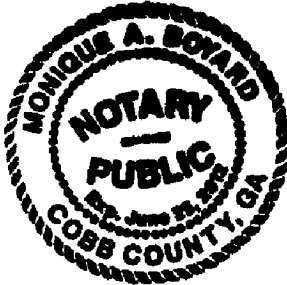
Defendants are liable for not having proper Handicap Accessible Bathrooms in the living quarters for me being a Handicapped Patient confined to wheelchair. The Americans with Disabilities Act (ADA) bathroom regulations are designed to ensure that individuals with disabilities in Hospitals should have used handicapped accessible bathrooms in the patient room.

The Defendants needs to bring its bathrooms and elevators into Institution needs to bring its bathrooms and elevators into compliance with ADA regulations.

WHEREFORE, Plaintiff Patricia Yearby prays for the following relief:

- (a) Judgment against Defendants for compensatory damages in the amount of \$500,000.00.
- (b) For a trial by jury on all issues; and
- (c) For such other and further relief as this Court may deem just.

This 7th day of October, 2010



Respectively submitted,

Patricia Yearby